

HEARING DATE & TIME: 9/21/2020 9:00 am

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re:

Case No. 19-45196

Chapter: 13

John K Zafaranloo

Debtor(s)

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OBJECTION TO NOTICE OF MOTION

To the Hon. Elizabeth S. Stong, Bankruptcy Judge;

I John K Zafaranloo, Debtor in the above-captioned bankruptcy proceeding, respectfully Object to the Motion filed by Chapter 13 Trustee for the following relief, order dismissing Debtor's Chapter 13 case.

In support of this objection, I hereby allege as follows:
Issues as per Trustee's Motion to Dismiss have been addressed. Missing disclosure documents shall be uploaded prior to hearing date. Further, a modified plan and amended schedules will be filed to include treatment of Claim 13, updated vehicle information, and showing feasibility of the plan.
As to Claim 6 filed by Gourvitz & Gourvitz (the "Secured Creditor"), pursuant to CPLR 5018(c) once a judgment is docketed, it becomes a lien on real property of the debtor in that county. Secured Creditor's judgment, as filed with the Richmond County Clerk's office, is not a lien on all of Debtor's property, rather the judgment is a lien on any land currently owned or later acquired by the Debtor anywhere in the County. As such, Debtor's plan provides that Debtor will surrender the only real property he owns to the Secured Creditor.

Wherefore, I respectfully request that this Court enter an order denying the relief requested.

Dated: 09/14/2020

By: /s/ John K Zafaranloo
(Signature of Debtor)

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re:

Case No. 119-45196

Chapter: 13

John K Zafaranloo

Debtor(s)

-----X

CERTIFICATE OF SERVICE

The undersigned certifies that on 09/14/2020, a copy of the annexed papers was served by depositing same, enclosed in a properly addressed postage-paid envelope, in an official depository under the exclusive care of the United States Postal Service within the State of New Jersey, upon *[below specify the name and mailing address of each party served]*:

JOHN K ZAFARANLOO
235 DONGAN HILLS AVENUE
STATEN ISLAND, NY 10305

Notice by electronic transmission generated by the ECF system to the following person/entities pursuant to Bankruptcy Rule 9036:

Chapter 13 Trustee - Marianne De Rosa

Fay Servicing LLC c/o Gross Polowy LLC, ecfnotices@grosspolowy.com

Fay Servicing LLC c/o Friedman Vartolo, LLP, bankruptcy@friedmanvartolo.com

Gourvitz & Gourvitz, LLC, c/o Ari H. Gourvitz, ahg@gourvitz.com

Dated: 09/14/2020

/s/ Lorelle Hague

(Signature)